August 19, 2016 Reference No. 012636

Mr. Rich Conforti
MDEQ, OWMRP
P.O. Box 30241
Lansing, Michigan
U.S.A. 48909-7741

Dear Mr. Conforti:

Re: Response to Comments dated July 13, 2016
Comments on Supplemental RFI Groundwater Monitoring Annual Monitoring Report
RACER Former Peregrine, Inc., Coldwater Road Facility, Genesee Township, Michigan
MID 000 020 743

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), the following presents responses to the Michigan Department of Environmental Quality (MDEQ) comments and questions received in a letter dated July 13, 2016 regarding the "Supplemental RFI Groundwater Monitoring Annual Monitoring Report" submitted to the MDEQ on June 9, 2016 regarding the former Peregrine Coldwater Road Facility (Site) located at 1245 E Coldwater Road in Genesee Township, near Flint, Michigan.

For ease of review, the original comment is presented in *bold italics*, followed by a response.

DEQ Comment 1:

The OWMRP is not in agreement with the recommendation provided in Section 4 of the Report to discontinue analysis for volatile organic compounds (VOCs) in the 2017 annual sampling event. RACER should continue to analyze for VOCs in the annual event through next year as specified in the approved plan. As specified in the plan, groundwater monitoring requirements will be re-evaluated following the 3-year monitoring period that will conclude with the 2017 annual monitoring event in the first quarter of 2017.

Response:

RACER will continue monitoring VOCs in accordance with the approved plan.

DEQ Comment 2:

The Report states that MW-16-10 was not sampled in the annual event due to "equipment failure." Although the OWMRP understands that MW-16-13 will be sampled as part of the second quarterly event in 2016, it should be noted that it is the OWMRP's opinion that equipment failure is not a valid justification for failure to sample a well in a quarterly event. In future monitoring events, the OWMRP expects that replacement equipment will be procured in a timely manner so that the well can be sampled as part of the quarterly event as scheduled.

GHD
14496 Sheldon Road Suite 200 Plymouth Michigan 48170 USA
T 734 453 5123 F 734 453 3792 W www.ghd.com

Response:

In future monitoring events, replacement equipment will be procured as quickly as possible so that quarterly event can be completed in its entirety in the shortest time period. Table 1 (attached) presents the results of the June 30, 2016 sampling of monitoring well MW-16-13. All results are consistent with historic monitoring results and are below standard screening criteria.

DEQ Comment 3:

Given that the facility was formerly a large plating facility, including chrome plating, it is likely that perfuorinated chemicals (PFCs), including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) compounds were used as a mist suppressant in the plating operations. PFCs, including PFOA and PFOS, are emerging contaminants of concern whose presence at the Facility has not yet been investigated. Therefore, the Facility must provide a proposed plan to investigate for their presence in groundwater at the Facility.

******Additional information provided******

Response:

RACER has reviewed the information provided regarding PFCs and proposes to complete a review of available records for the plant in order to determine if mist suppression was performed as part of the plating operations and if so, whether or not PFOA or PFOS were used as mist suppressants. The findings of the records review, along with any recommendations, will be provided to MDEQ by October 1, 2016.

Should you have any questions on the above, please do not hesitate to contact David Favero with RACER or us.

Sincerely,

GHD

Michael R. Tomka, P.E.

RC/jp/23

Encl.

cc: Dave Favero/Grant Trigger, RACER
Joe Rogers/ William Yocum, MDEQ

Table 1

MW-16-10 Analytical Results Summary
RACER Coldwater Road Industrial Lands
Genesee Township, Michigan

Deep_or_Shallow:										Deep	Deep	Deep	Deep
Sample Location:										MW-16-10	MW-16-10	MW-16-10	MW-16-10
Sample ID:										GW-12636-032714-SSH-1418	GW-12636-032714-SSH-1419	GW-12636-032615-SSH-15008	GW-12636-063016-SSH-3116
Sample Date:										3/27/2014	3/27/2014 (Duplicate)	3/26/2015	6/30/2016
Parameters	**Units**	**Deep_Aqufer Background a**	**Res/Non_Res/ Res Drinking Water b**	**Res/Non_Res/Res Drinking Water-health based criteria c**	**Res/Non_Res/ NonRes Drinking Water d**	**Res/Non_Res/ NonRes Drinking Water-health based criteria e**	**Res/Non_Res/ GW SW Interface f**	**Res/Non_Res/ Res GW Volatilization_ IndoorAir Inhalation g**	**Res/Non_Res/ NonRes GWVolatilization_ IndoorAirInhalation h**				
VOAs													
1,1,1-Trichloroethane	mg/L	-	0.2	-	0.2	-	0.089	660	1300	0.001 U	0.001 U	0.001 U	0.001 U
1,1,2,2-Tetrachloroethane	mg/L	-	0.0085	-	0.035	-	0.078	12	77	0.001 U	0.001 U	0.001 U	0.001 U
1,1,2-Trichloroethane	mg/L	-	0.005	-	0.005	-	0.33	17	110	0.001 U	0.001 U	0.001 U	0.001 U
1,1-Dichloroethane	mg/L	-	0.88	-	2.5	-	0.74	1000	2300	0.001 U	0.001 U	0.001 U	0.001 U
1,1-Dichloroethene	mg/L	-	0.007	-	0.007	-	0.13	0.2	1.3	0.001 U	0.001 U	0.001 U	0.001 U
1,2,4-Trichlorobenzene	mg/L	-	0.07	-	0.07	-	0.099	300	300	0.001 U	0.001 U	0.001 U	0.001 U
1,2,4-Trimethylbenzene	mg/L	-	0.063	-	0.063	-	0.017	56	56	0.001 U	0.001 U	0.001 U	0.001 U
1,2-Dibromo-3-chloropropane (DBCP)	mg/L	-	0.0002	-	0.0002	-	-	0.22	1.2	0.001 U	0.001 U	0.001 U	0.001 U
1,2-Dibromoethane (Ethylene dibromide)	mg/L	-	0.00005	-	0.00005	-	0.0057	2.4	15	0.001 U	0.001 U	0.001 U	0.001 U
1,2-Dichlorobenzene	mg/L	-	0.6	-	0.6	-	0.013	160	160	0.001 U	0.001 U	0.001 U	0.001 U
1,2-Dichloroethane	mg/L	-	0.005	-	0.005	-	0.36	9.6	59	0.001 U	0.001 U	0.001 U	0.001 U
1,2-Dichloropropane	mg/L	-	0.005	-	0.005	-	0.23	16	36	0.001 U	0.001 U	0.001 U	0.001 U
1,3,5-Trimethylbenzene	mg/L	-	0.072	-	0.072	-	0.045	61	61	0.001 U	0.001 U	0.001 U	0.001 U
1,3-Dichlorobenzene	mg/L	-	0.0066	-	0.019	-	0.028	18	41	0.001 U	0.001 U	0.001 U	0.001 U
1,4-Dichlorobenzene	mg/L	-	0.075	-	0.075	-	0.017	16	74	0.001 U	0.001 U	0.001 U	0.001 U
2-Butanone (Methyl ethyl ketone) (MEK)	mg/L	-	13	-	38	-	2.2	240000	240000	0.01 U	0.01 U	0.01 U	0.01 U
2-Hexanone	mg/L	-	1	-	2.9	-	-	4200	8700	0.01 U	0.01 U	0.01 U	0.01 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	mg/L	-	1.8	-	5.2	-	-	20000	20000	0.01 U	0.01 U	0.01 U	0.01 U
Acetone	mg/L	-	0.73	-	2.1	-	1.7	1000000	1000000	0.01 U	0.01 U	0.01 U	0.01 U
Benzene	mg/L	-	0.005	-	0.005	-	0.2	5.6	35	0.001 U	0.001 U	0.001 U	0.001 U
Bromodichloromethane	mg/L	-	0.08	-	0.08	-	-	4.8	37	0.001 U	0.001 U	0.001 U	0.001 U
Bromoform	mg/L	-	0.08	-	0.08	-	-	470	3100	0.001 U	0.001 U	0.001 U	0.001 U
Bromomethane (Methyl bromide)	mg/L	-	0.01	-	0.029	-	0.035	4	9	0.001 U	0.001 U	0.001 U	0.001 U
Carbon disulfide	mg/L	-	0.8	-	2.3	-	-	250	550	0.005 U	0.005 U	0.005 U	0.005 U
Carbon tetrachloride	mg/L	-	0.005	-	0.005	-	0.045	0.37	2.4	0.001 U	0.001 U	0.001 U	0.001 U
Chlorobenzene	mg/L	-	0.1	-	0.1	-	0.025	210	470	0.001 U	0.001 U	0.001 U	0.001 U
Chloroethane	mg/L	-	0.43	-	1.7	-	1.1	5700	5700	0.001 U	0.001 U	0.001 U	0.001 U
Chloroform (Trichloromethane)	mg/L	-	0.08	-	0.08	-	0.35	28	180	0.001 U	0.001 U	0.001 U	0.001 U
Chloromethane (Methyl chloride)	mg/L	-	0.26	-	1.1	-	-	8.6	45	0.001 U	0.001 U	0.001 U	0.001 U
cis-1,2-Dichloroethene	mg/L	-	0.07	-	0.07	-	0.62	93	210	0.001 U	0.001 U	0.001 U	0.001 U
cis-1,3-Dichloropropene	mg/L	-	-	-	-	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Cyclohexane	mg/L	-	-	-	-	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Dibromochloromethane	mg/L	-	0.08	-	0.08	-	-	14	110	0.001 U	0.001 U	0.001 U	0.001 U
Dichlorodifluoromethane (CFC-12)	mg/L	-	1.7	-	4.8	-	-	220	300	0.001 U	0.001 U	0.001 U	0.001 U
Ethylbenzene	mg/L	-	0.074	-	0.074	-	0.018	110	170	0.001 U	0.001 U	0.001 U	0.001 U
Isopropyl benzene	mg/L	-	0.8	-	2.3	-	0.028	56	56	0.001 U	0.001 U	0.001 U	0.001 U
Methyl acetate	mg/L	-	-	-	-	-	-	-	-	0.01 U	0.01 U	0.01 U	0.01 U
Methyl cyclohexane	mg/L	-	-	-	-	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Methyl tert butyl ether (MTBE)	mg/L	-	0.04	-	0.04	-	7.1	47000	47000	0.001 U	0.001 U	0.001 U	0.001 U
Methylene chloride	mg/L	-	0.005	-	0.005	-	1.5	220	1400	0.005 U	0.005 U	0.005 U	0.005 U
Styrene	mg/L	-	0.1	-	0.1	-	0.08	170	310	0.001 U	0.001 U	0.001 U	0.001 U
Tetrachloroethene	mg/L	-	0.005	-	0.005	-	0.06	25	170	0.001 U	0.001 U	0.001 U	0.001 U
Toluene	mg/L	-	0.79	-	0.79	-	0.27	530	530	0.001 U	0.001 U	0.001 U	0.001 U
trans-1,2-Dichloroethene	mg/L	-	0.1	-	0.1	-	1.5	85	200	0.001 U	0.001 U	0.001 U	0.001 U
trans-1,3-Dichloropropene	mg/L	-	-	-	-	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Trichloroethene	mg/L	-	0.005	-	0.005	-	0.2	2.2	4.9	0.001 U	0.001 U	0.001 U	0.001 U
Trichlorofluoromethane (CFC-11)	mg/L	-	2.6	-	7.3	-	-	1100	1100	0.001 U	0.001 U	0.001 U	0.001 U
Trifluorotrichloroethane (CFC-113)	mg/L	-	170	-	170	-	0.032	170	170	0.001 U	0.001 U	0.001 U	0.001 U
Vinyl chloride	mg/L	-	0.002	-	0.002	-	0.013	1.1	13	0.001 U	0.001 U	0.001 U	0.001 U
Xylenes (total)	mg/L	-	0.28	-	0.28	-	0.041	190	190	0.002 U	0.002 U	0.002 U	0.002 U

Table 1

MW-16-10 Analytical Results Summary
RACER Coldwater Road Industrial Lands
Genesee Township, Michigan

Deep_or_Shallow:										Deep	Deep	Deep	Deep
Sample Location:										MW-16-10	MW-16-10	MW-16-10	MW-16-10
Sample ID:										GW-12636-032714-SSH-1418	GW-12636-032714-SSH-1419	GW-12636-032615-SSH-15008	GW-12636-063016-SSH-3116
Sample Date:										3/27/2014	3/27/2014 (Duplicate)	3/26/2015	6/30/2016
Parameters	**Units**	**Deep_Aqufer Background a**	**Res/Non_Res/ Res Drinking Water b**	**Res/Non_Res/Res Drinking Water-health based criteria c**	**Res/Non_Res/ NonRes Drinking Water d**	**Res/Non_Res/ NonRes Drinking Water-health based criteria e**	**Res/Non_Res/ GW SW Interface f**	**Res/Non_Res/ Res GW Volatilization_ IndoorAir Inhalation g**	**Res/Non_Res/ NonRes GWVolatilization_ IndoorAirInhalation h**				
VOAs													
Metals													
Aluminum	mg/L	5.3	0.05	0.3	0.05	4.1	-	-	-	0.13	0.11	-	-
Aluminum (dissolved)	mg/L	0.133	0.05	0.3	0.05	4.1	-	-	-	0.05 U	0.05 U	0.05 U	0.05 U
Antimony	mg/L	0.002	0.006	-	0.006	-	0.13	-	-	0.002 U	0.002 U	-	-
Antimony (dissolved)	mg/L	0.002	0.006	-	0.006	-	0.13	-	-	0.002 U	0.002 U	0.00071 J	0.00034 J
Arsenic	mg/L	0.102	0.01	-	0.01	-	0.01	-	-	0.016	0.015	-	-
Arsenic (dissolved)	mg/L	0.089	0.01	-	0.01	-	0.01	-	-	0.014	0.017	0.016	0.014
Barium	mg/L	0.47	2	-	2	-	-	-	-	0.47	0.48	-	-
Barium (dissolved)	mg/L	0.553	2	-	2	-	-	-	-	0.44	0.48	0.48	0.45
Beryllium	mg/L	0.001	0.004	-	0.004	-	-	-	-	0.001 U	0.001 U	-	-
Beryllium (dissolved)	mg/L	0.001	0.004	-	0.004	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001	0.005	-	0.005	-	-	-	-	0.001 U	0.001 U	-	-
Cadmium (dissolved)	mg/L	0.001	0.005	-	0.005	-	-	-	-	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.007	0.1	-	0.1	-	-	-	-	0.005 U	0.005 U	-	-
Chromium (dissolved)	mg/L	0.011	0.1	-	0.1	-	-	-	-	0.005 U	0.005 U	0.005 U	0.01 U
Cobalt	mg/L	0.007	0.04	-	0.1	-	0.1	-	-	0.007 U	0.007 U	-	-
Cobalt (dissolved)	mg/L	0.007	0.04	-	0.1	-	0.1	-	-	0.007 U	0.007 U	0.007 U	0.00027 J
Copper	mg/L	0.015	1	-	1	-	-	-	-	0.002 U	0.002 U	-	-
Copper (dissolved)	mg/L	0.04	1	-	1	-	-	-	-	0.002 U	0.002 U	0.002 U	0.004 U
Iron	mg/L	7.9	0.3	2.0	0.3	5.6	-	-	-	0.48	0.47	-	-
Iron (dissolved)	mg/L	3.62	0.3	2.0	0.3	5.6	-	-	-	0.28	0.34	0.23	0.59
Lead	mg/L	0.003	0.004	-	0.004	-	-	-	-	0.003 U	0.003 U	-	-
Lead (dissolved)	mg/L	0.003	0.004	-	0.004	-	-	-	-	0.003 U	0.003 U	0.003 U	0.005 U / 0.003 U
Manganese	mg/L	0.252	0.05	0.86	0.05	2.5	-	-	-	0.13	0.14	-	-
Manganese (dissolved)	mg/L	0.292	0.05	0.86	0.05	2.5	-	-	-	0.13	0.13	0.094	0.053 / 0.055
Mercury	mg/L	0.0002	0.002	-	0.002	-	0.0000013	0.056	0.056	0.0002 U	0.0002 U	-	-
Mercury (dissolved)	mg/L	0.0002	0.002	-	0.002	-	0.0000013	0.056	0.056	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Nickel	mg/L	0.02	0.1	-	0.1	-	-	-	-	0.02 U	0.02 U	-	-
Nickel (dissolved)	mg/L	0.022	0.1	-	0.1	-	-	-	-	0.02 U	0.02 U	0.003 J	0.02 U
Selenium	mg/L	0.005	0.05	-	0.05	-	0.005	-	-	0.005 U	0.005 U	-	-
Selenium (dissolved)	mg/L	0.005	0.05	-	0.05	-	0.005	-	-	0.005 U	0.005 U	0.005 U	0.00051 J
Silver	mg/L	0.0002	0.034	-	0.098	-	0.0002	-	-	**0.00051[f]**	**0.00032[f]**	-	-
Silver (dissolved)	mg/L	0.0002	0.034	-	0.098	-	0.0002	-	-	0.00001 J	0.0002 U	0.0002 U	0.0002 U
Thallium	mg/L	0.001	0.002	-	0.002	-	0.0037	-	-	0.001 U	0.001 U	-	-
Thallium (dissolved)	mg/L	0.001	0.002	-	0.002	-	0.0037	-	-	0.001 U	0.001 U	0.00026 J	0.002 U
Vanadium	mg/L	0.015	0.0045	-	0.062	-	0.027	-	-	0.004 U	0.004 UJ	-	-
Vanadium (dissolved)	mg/L	0.004	0.0045	-	0.062	-	0.027	-	-	0.004 U	0.004 U	0.004 U	0.004 U
Zinc	mg/L	0.039	2.4	-	5	-	-	-	-	0.02 U	0.0064 J	-	-
Zinc (dissolved)	mg/L	0.0521	2.4	-	5	-	-	-	-	0.02 U	0.02 U	0.02 U	0.05 U
Wet													
Cyanide (amenable)	mg/L	-	0.2	-	0.2	-	-	-	-	0.0050 U	0.0050 U	0.0050 U	-

Notes:

U - Not detected at the associated reporting limit.
J - Estimated concentration.
UJ - Not detected; associated reporting limit is estimated.